

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>MARK CAIRNS,</b>	:	<b>CIVIL ACTION</b>
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>NO. 2:14-CV-05671</b>
	:	
<b>HIBU PLC, et al.</b>	:	
	:	
<b>Defendants.</b>	:	

**DEFENDANTS' MOTION FOR CONTINUANCE OF  
PRELIMINARY PRETRIAL CONFERENCE**

Defendants hibu plc, hibu Inc., and Mike Pocock ("Defendants"), by and through their undersigned attorneys, hereby move for a continuance of the Preliminary Pretrial Conference scheduled for July 9, 2015, and state as follows:

1. On May 26, 2015, this Court issued an order scheduling a preliminary pretrial conference for July 9, 2015, at 11:00 a.m., in the United States Courthouse, 601 Market Street, Room 4000, Philadelphia, Pennsylvania.
2. The undersigned attorneys at Drinker Biddle & Reath, LLP act as local counsel for Defendants in this matter. The undersigned attorneys at Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. act as lead counsel for Defendants and have been admitted *pro hac vice*.
3. While this Court's clerk has informed the undersigned that only the presence of local counsel is required at the preliminary pretrial conference, Plaintiff desires that Bret Cohen, its lead counsel, also attend the conference. Unfortunately, Attorney Cohen is unavailable from June 29, 2015 through July 13, 2015, due to a preliminary injunction hearing in a different matter and then a pre-planned vacation.

4. Defendants' counsel conferred with counsel for Plaintiff, Clifford Haines, Esq., regarding rescheduling the preliminary pretrial conference so that Attorney Cohen may attend. Counsel for Plaintiff does not oppose the request but indicated that he is unavailable from July 15, 2015 through July 31, 2015, due to a pre-planned vacation and business out-of-state.

5. Counsel for Plaintiff and counsel for Defendants are mutually available however on any of the following dates: August 4th, 5th, 6th, 11th, 13th, 18th, 19th or 20th.

6. Defendants therefore respectfully request that the Court reschedule the preliminary pretrial conference to one of the dates listed above.

Dated: June 16, 2015

/s/ Dennis M. Mulgrew, Jr.  
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*hibu plc, hibu Inc., and Michael Pocock*

**CERTIFICATE OF SERVICE**

I, Dennis Mulgrew, hereby certify that a true and correct copy of the foregoing Motion for Continuance was served on counsel for the Plaintiff via the Court's ECF system and email as follows:

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Dated: June 16, 2015

/s/ Dennis M. Mulgrew, Jr.  
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